

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commissions' Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911)	
Emergency Calling Systems)	
)	
Phase II Compliance Deadlines for)	
Non-Nationwide CMRS Carriers)	

To: Wireless Telecommunications Bureau

**REQUEST FOR LIMITED WAIVER AND EXTENSION
OF THE HANDSET PENETRATION DEADLINE
OF THE COMMISSION'S PHASE II E911 RULES**

North Carolina RSA 3 Cellular Telephone Company d/b/a Carolina West Wireless ("Carolina West Wireless"), by its attorneys and pursuant to 47 C.F.R. §1.925, hereby respectfully requests a limited waiver and extension of Section 20.18(g)(1)(v) of the Commission's rules regarding Phase II of Enhanced 911 ("E911") services, 47 C.F.R. §20.18(g)(1)(v), which requires Tier III carriers who employ a handset-based Phase II solution to achieve a location-capable handset penetration rate among subscribers of at least 95% by December 31, 2005.¹

As set forth below, circumstances exist wherein achieving the 95% subscriber penetration requirement by the deadline is unlikely, despite Carolina West Wireless' best efforts at promoting to subscribers handsets with automatic location identification ('ALI') features. For the reasons shown herein, Carolina West Wireless requests a twelve-month extension of the penetration requirement, until December 31, 2006.

¹ Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling System, CC Docket 94-102, Order To Stay (released July 26, 2002).

I. Background

Carolina West Wireless is a Cellular Radiotelephone Services licensee operating in Cellular Market Areas 566 B1 – North Carolina Rural Service Area 2 – Yancey and 567 B1 – North Carolina Rural Service Area 3 - Ashe (“NC RSAs 2 & 3”). Carolina West Wireless is a qualified Tier III carrier, serving fewer than 500,000 subscribers as of December 31, 2001. Carolina West Wireless has implemented a handset-based location technology for the delivery of E911 services over its newly implemented Code Division Multiple Access (“CDMA”) digital network. The CDMA network was deployed throughout Carolina West Wireless’ service area in early 2004.

In support of the immediate need for an extension of the 95% penetration deadline, the following is submitted.

II. Carolina West Wireless Has a History of Compliance with Requests from PSAPs for E911 Services

A total of seven Public Safety Answering Points (“PSAPs”) are located within Carolina West Wireless’s cellular service area. All seven PSAPs have requested and have become capable of receiving and processing Phase I and Phase II E911 data. Carolina West Wireless fulfilled all the PSAPs’ requests in a timely manner, and all seven PSAPs are receiving Phase I and Phase II data from Carolina West Wireless. Carolina West Wireless utilized the services of TeleCommunications Systems, Inc. (“TCS”), with their proprietary Signal Soft location system, to complete installation and testing of equipment necessary to transmit Phase I and Phase II data to PSAPs. TCS coordinates with the PSAPs, operates the location database and optimizes E911 performance on Carolina West Wireless’s CDMA network system, which utilizes a Nortel DMS-MTX switch.

III. Carolina West Wireless Has Demonstrated Good Faith in Complying with the E911 Requirements

Carolina West Wireless has complied with all of the E911 requirements promulgated by the FCC, and has met E911 implementation benchmarks to which it, in particular, was made subject in the Commission's Order in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems and E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket 94-102, at para. 64 (released April 1, 2005). Carolina West Wireless began selling and activating only location-capable digital handsets on June 18, 2004. To this day, 100% of all new digital handsets activated on Carolina West Wireless' system are location capable. Also in keeping with the Order, Carolina West Wireless timely submitted its Interim Report due on September 1, 2005.

Nevertheless, Carolina West Wireless foresees a serious challenge in assuring that penetration of location capable handsets among Carolina West Wireless' subscribers will reach ninety-five percent no later than December 31, 2005.

Carolina West Wireless' full-scale CDMA network deployment has prompted subscribers to gradually adopt personal equipment upgrades. Carolina West Wireless continues to operate its TDMA and analog networks, but has engaged in targeted activities to encourage subscribers to convert from TDMA and analog handsets to handsets that are compatible with the CDMA system and the Phase II data delivery system.

Aggressive promotional campaigns began in January 2005 to market new handsets, all of which were ALI-capable. Additional campaigns have been conducted throughout this summer to

encourage subscribers to acquire the ALI-capable handsets. The campaigns advertise the safety and coverage advantages of the CDMA system, and offer existing subscribers new handsets with the signing of a new contract. Carolina West Wireless overtly advertises as a feature of the new phones their location assistance capabilities in the event of emergency. Direct mail campaigns and special offers are included in the enticement program. Samples of Carolina West Wireless' advertisements and promotional announcements are included herewith. The promotions include retention related efforts designed to entice existing customers into Carolina West Wireless' stores where only location-capable phones are sold. Once existing TDMA and analog customers are in the stores, representatives proactively sell the benefits of CDMA and request migration to a new CDMA phone.

Carolina West Wireless maintains a dialogue with the PSAPs in its service area and with the Statewide Wireless E911 Coordinator. Safety officials are aware of the ongoing transition of Carolina West Wireless' subscriber base, and that handset conversion will proceed over a period of time. The PSAPs have expressed no objection or concern with the penetration schedule. In light of the slower than anticipated pace of conversion of subscribers in purchasing new location-capable handsets, Carolina West Wireless requests specific relief from the penetration deadline of December 31, 2005.

IV. The Public Interest Would Be Served by Waiver of the Penetration Deadline

Grant of a limited waiver to Carolina West Wireless of 47 C.F.R. §20.18(g)(1)(v) would serve the public interest. An extension through December 31, 2006, of the penetration deadline is warranted given the unique facts and circumstances of Carolina West Wireless' position. As set forth in Section 106(a) of the Act, the Commission is to grant a waiver to Tier III carriers "if strict enforcement of the 95% subscriber penetration requirements would result in consumers having

decreased access to emergency services.”² Indeed, Carolina West Wireless’ subscribers would be denied access to Phase II E911 services if Carolina West Wireless is required to deactivate existing service, or reduce construction activities. Yet to continue to operate at less than 95% penetration would constitute a violation of FCC Rules.

If not granted a waiver, Carolina West Wireless would be in the position of having to cease or reduce operations to avoid enforcement action, or expend resources to convert to a network-based solution in order to avoid handset-based liability. Neither is a practical solution. The network-based location system would not work well in Carolina West Wireless’ rural service area. Due to wide spacing, the cells would not properly triangulate to achieve required Phase II accuracy. Deactivation of the TDMA and analog systems would take away cellular coverage from persons who depend upon those communications services, and who rely upon their legacy TDMA and analog phones for safety and for elementary contact with other persons. Many of those persons are located in the most isolated, rural areas, in the more rugged terrain included within Carolina West Wireless’ service area. Without their TDMA and 3-watt analog phones, the customers would be unable to place calls, including calls to 911 for basic and Phase I emergency services.

These alternatives to waiver would invariably result in consumers having “decreased access to emergency services,” particularly in mountainous areas where the challenge is most formidable in assuring that the CDMA signal is as strong as the TDMA and analog signals. Because enforcement

² In December 2004, Congress enacted the Ensuring Needed Help Arrives Near Callers Employing 911 Act of 2004 (*Enhance 911 Act*). The *Enhance 911 Act* directed the Commission to grant qualified Tier III carriers’ requests for relief of the December 31, 2005 ninety-five percent penetration deadline for location-capable handsets, as set forth in Section 20.18(g)(1)(v) of the Commission’s Rules, if “strict enforcement of the requirements of that section would result in consumers having decreased access to emergency services.”

of the 95% deadline could have the unintended consequence of forcing Carolina West Wireless to shut down its TDMA and analog networks and deprive subscribers of basic 911 services, or to switch to a less reliable, network-based Phase II solution, Carolina West Wireless requests review under the *Enhance 911 Act* waiver standard.

In general, furthermore, a waiver is appropriate whenever special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.³ The Commission has established standards to be used when acting upon requests for a waiver of E911 deadlines and obligations.⁴ The Commission has held that it will grant waiver requests that are specific, focused, and limited in scope, with a clear path to full compliance.⁵ The Commission has stated that carriers should undertake concrete steps necessary to come as close as possible to full compliance and should document their efforts aimed at compliance in support of any waiver request.⁶ As set forth below, Carolina West Wireless meets the Commission's standards in that the circumstances underlying the request, in sum, present a special case that justifies a limited E911 Phase II waiver and extension.

⁴ 47 C.F.R. § 1.3; *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D. C. Cir. 1990) (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D. C. Cir. 1969)).

⁵ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Fourth Memorandum Opinion and Order, 15 FCC Rcd 17442, 17457-58, paras. 43-44 (2000) (*E911 Fourth Memorandum Opinion and Order*).

⁶ *E911 Fourth Memorandum Opinion and Order*, 15 FCC Rcd at 17458, para. 44.

⁷ *Id.*

IV. Carolina West Wireless Has a Plan for Compliance with the 95% Penetration Benchmark

As stated, 100% of digital handsets that are newly activated on Carolina West Wireless' system are ALI-capable. At the end of December 2004, 45.1% of the total activated handsets on Carolina West Wireless' system were ALI-capable. By the end of August 2005, the penetration of ALI-capable handsets had risen to 67.4%. Thus the penetration rate has been increasing by about 2.8% per month, as demonstrated on the attached chart. At the end of August 2005, 87% of minutes of use on the network were CDMA minutes, up from 69% in December 2004. This improvement represents considerable good faith progress by Carolina West Wireless to convince subscribers to exchange old handsets for new, ALI-capable handsets. This is a challenge given that many subscribers adamantly insist upon keeping their TDMA and analog phones because the phones are more dependable, operate in a larger range, and are already programmed with favorite phone numbers and customized features.

Carolina West Wireless anticipates that about 78.6% of its subscribers will have ALI-capable handsets by December 31, 2005, and about 96% by December 31, 2006. Nonetheless, conversion of the next 28% of handsets is expected to be a challenging process due to the various factors described herein. Progress is being made, but at current conversion rates, 95% penetration cannot be assured before December 31, 2006.

Carolina West Wireless believes it will be able to meet the 95% subscriber penetration requirement by December 31, 2006, in part because customers will become aware that the Commission's analog cellular service requirement sunsets on February 18, 2008. That event will

likely provide an incentive for some analog customers to upgrade their handsets, particularly those who desire to roam into markets where analog signal will be no longer available. On the other hand, many diehard analog and TDMA handset users will refuse to convert until Carolina West Wireless is able to build out its CDMA network to provide the signal strength and quality as it now provides via TDMA and analog, or until Carolina West Wireless disables the TDMA and analog signals. Subscribers who reside or travel in the most rural parts of the cellular service area will be the last to switch to ALI-capable handsets. In service to those customers, and because of the wilderness nature of much of NC RSAs 2 & 3, Carolina West Wireless will likely offer analog services well into the future.


In keeping with FCC rules and policy, Carolina West Wireless will maintain its policy of selling and activating only ALI-capable digital handsets. It will continue to conduct marketing campaigns to encourage consumer adoption of new handsets. Carolina West Wireless will also continue to augment its CDMA network facilities and provide Phase II E911 services and other coordination services to the local PSAPs. However, given the rural character of Carolina West Wireless' market and the reliance by local subscribers upon TDMA and analog phones and service, it is necessary for Carolina West Wireless to respectfully request grant of a waiver of the 95% penetration requirement.

Conclusion

Based on the foregoing reasons, grant of a limited waiver of the Commission's Phase II E911 rules will serve the public interest. Accordingly, Carolina West Wireless requests a temporary waiver and extension of time, through December 31, 2006, to achieve a location-capable handset penetration rate among subscribers of at least 95%. The public interest benefit in this case equals or exceeds that which the Commission has found in other instances to be sufficient for waiver, and the request meets the standards of the *Enhance 911 Act*. Therefore Carolina West Wireless requests that a limited waiver and extension of Section 20.18(g)(1)(v) of FCC Rules be granted as proposed.

Respectfully submitted,

**North Carolina RSA 3 Cellular Telephone Company
d/b/a Carolina West Wireless**

A handwritten signature in black ink, reading "Pamela L. Gist". The signature is written in a cursive style with a horizontal line underneath it.

David L. Nace
Pamela L. Gist

Its Attorneys

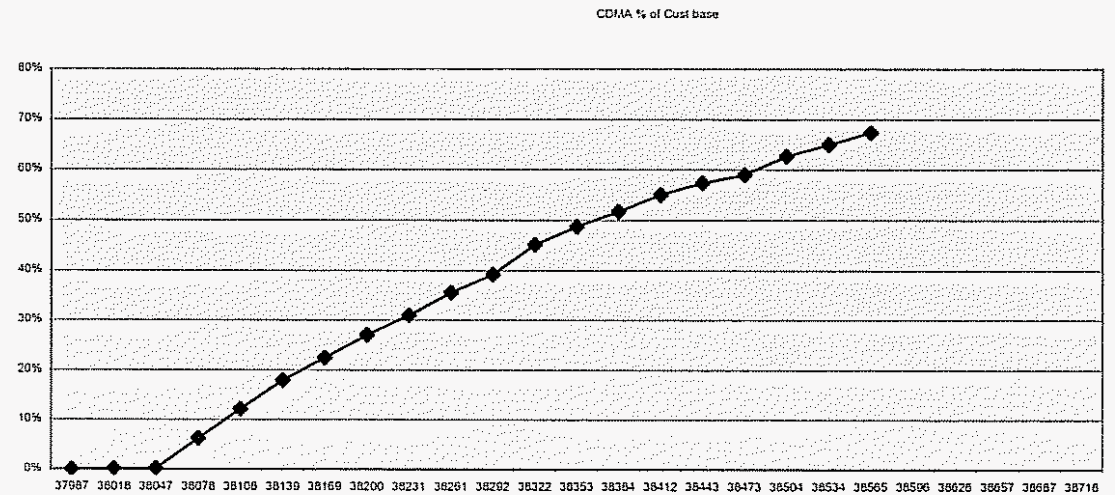
Lukas, Nace, Gutierrez & Sachs, Chartered
1650 Tysons Boulevard, Suite 1500
McLean, Virginia 22102
(703) 584-8678

October 5, 2005

Carolina West Wireless

Penetration Rates of Location-Capable E911 Handsets

	Dec-04	Jan-05	Feb-05	Mar-05	Apr-05	May-05	Jun-05	Jul-05	Aug-05
CDMA % of Cust base	45.13%	48.78%	51.77%	55.05%	57.34%	59.00%	62.66%	65.02%	67.39%
CDMA customers	20837	22488	24086	25674	26782	27972	29794	31054	32313
Customer Base	46179	46103	46529	46643	46708	47403	47552	47766	47949
CDMA Minutes as % of Network Traffic	69.27%	71.17%	78.40%	78.31%	80.85%	83.51%	82.97%	84.65%	86.98%



Carolina West Wireless

Efforts to Market Location-Capable E911 Handsets

CWW Retention Efforts

Moving from TDMA to CDMA



1st Cell Site Postcard - Feb.

- Advertised new sites in Westfield, Linville, Ferguson & Blowing Rock

Great News! We've expanded our service in your area. We now have more than 70 cell sites throughout our 6-county service area—more than any other carrier in the region. Plus, we've recently added a cell site in Ferguson. However, the new cell site is equipped with our new CDMA technology. To get the most from your wireless service and the new cell site, you'll need to exchange your current TDMA or analog phone for a new CDMA phone.

At Carolina West Wireless, we have a wide selection of CDMA phones to choose from including phones with cameras, FM radios, & much more. We encourage you to trade in your old phone, just stop by any of our locations. Plus, bring in this postcard & we'll reward you with \$50 to use when you exchange your phone & extend your contract. This voucher can be redeemed toward any CDMA phone you choose.

We appreciate your continued business!
Your Friends at Carolina West Wireless

We've expanded
our service in your area...

& we're giving you a
\$50 reward
to use toward a new CDMA
phone to take advantage of it!

See reverse side for details.

Carolina West
Wireless



■ Guideline Sheet

1985年12月1日
1985年12月1日

[illegible][illegible]

I wanted to follow-up on the \$50 voucher that we recently sent out to customers in the Westfield, Livable, & Prosperous Communities program. I wanted to make sure that we are at one end of the same page as how we handled this particular voucher program.

Customers can choose to upgrade to a new year or a two year contract. Pricing for the program has been determined by the length of the contract that customers choose when upgrading. If customer chooses a price they pay less than \$50 plus phone will be free. Customer can not use any of the remaining amount towards accessories or credits on their account.

[illegible]

No other discounts will apply with this promotion.

any questions please feel free to ask.

Karen Polgal
California Water Wars

Marketing Specialist

Carolina West Wireless

336-973-5000 ext 251

Surry Postcard - Feb.

- Sent to Surry County customers

Two local companies working together
to serve your needs...



Carolina West
Wireless

Bring in this card to take advantage of these specials...

1st Month FREE*
when you sign up for **Surry Internet**

FREE** Accessory
with any phone purchase (in-stock items only)

* Lowest available rates apply. See store for details. ** Limited to \$100.00 or less.

Local • Long Distance • Internet • DSL • Wireless • Prepay Wireless

Surry County's Solution for Telecommunications

Additional locations
to serve you better!

New location!!

Surry Telephone/
Carolina West Wireless
New Market Crossing
Shopping Center
336-374-5000

Surry Telephone/
Carolina West Wireless
2133 Rockford St. Mount Airy
336-374-5000

Authorized Agent

Electronic Services & Sales
Tony Parker • 336-786-9084

Business Account Executive

Jennifer Simmons • 336-451-1788
jsimmons@carolinawest.com



Carolina West
Wireless

PO Box 385
Dobson, NC 27017

Referral Program - Feb.

- Reward customers for referring their friends & co-workers



**Carolina West
Wireless**
www.carolinawest.com



**We appreciate
your business!**



**Refer a friend, co-worker
or neighbor & receive
\$20
Carolina West Bucks!**

Just write your name and wireless number on the referral card and give to your friend. When your friend signs up for service and presents the referral card, we'll mail you \$20 Carolina West Bucks for each new, confirmed account.* You can use your Carolina West Bucks toward products or services.

*Restrictions may apply.
See us for details.

**Carolina West
Wireless**

Ask your friends to present this card when signing up
for service with Carolina West Wireless.

Your Name

Your Wireless Number

I recommend Carolina West Wireless Service!

Friend's Name

Ask your friends to present this card when signing up
for service with Carolina West Wireless.

Your Name

Your Wireless Number

I recommend Carolina West Wireless Service!

Friend's Name

Ask your friends to present this card when signing up
for service with Carolina West Wireless.

Your Name

Your Wireless Number

I recommend Carolina West Wireless Service!

Friend's Name

Referral Program - Jan/Feb.

■ Terms & Conditions and Bill insert

CWW Referrals "Refer A Friend"

1. A separate card must be completed in full for each referral sent to Carolina West Wireless. Referred Friend can present completed card at activation.
2. Referred friend must activate a new and individual billing account with CWW. Referrals cannot be honored if complete information is not received.
3. Customer's account must be current and active before any referral credit can be issued.
4. This offer does not apply to new lines of service added within a company or family, and is valid for only the first line of a new multiple line account.
5. No more than 3 referrals per customer in a 1 year period.
6. Referring customer will receive Bonus Bucks after new account has been activated for 90 days.
7. Post paid can refer a post paid or a prepaid customer and receive bonus bucks to be used towards an accessory purchase or the \$20 can be applied their account. Prepaid customers can refer a new customer but bonus bucks will be handled differently. Prepaid customers can use their bonus bucks toward an accessory purchase only. prepaid customers will not be allowed to use their bonus bucks for purchasing airtime.
8. Please make sure that the information on the referral card is valid. This may prevent having to call a customer back or the possibility of a customer not receiving the bonus buck credit for invalid information.

Terms and Conditions

Post with the your name and wireless number on the referral card and give to your friend. When your friend signs up for service and generates the referral card, we'll mail you \$20 Carolina West Bucks for each new confirmed account. * You can use your Carolina West Bucks towards products or services.

Carolina West Bucks!
\$20
& receive



**Refer
a friend...**



**Carolina West
Wireless**

800-233-5007
www.carolinawest.com

* Terms and conditions apply.
See stores for details.

Your Name _____
Your Wireless Number _____
I recommend Carolina West Wireless service!
Friend's Name _____

New Location in Elkin - March

- Sent out to customers of previous agent.

We appreciate your business.

We now have a new location in Elkin to serve you.
Stop by for any of your Carolina West Wireless needs.


416 CC Camp Rd • on Hwy 268 Bypass
336-374-5000

Open Mon - Fri • 8:30 a.m. - 5:30 p.m.
Saturday 9 a.m. - 1 p.m.

For our business customers, we also have a
business account executive. Just call for an on-site
appointment to see the latest in phones and make
sure you're on the best possible rate plan.

Business Account Executive
Jennifer Simmons • 336-401-1788

**Carolina West
Wireless**



**Carolina West
Wireless**

PO Box 959
Wilkesboro, NC 28697

Plenty of phones in stock! No waiting!

Bring in this coupon to our
new Elkin store &
redeem for:

**50% off
any accessory**

Expires 7/30/03.

Bill insert - April

- Encouraged customers to check out our new and improved rate plans.

Had a rate plan check-up lately...

Call or visit any Carolina West Wireless location or participating agent to make sure you're on the newest rate plan that fits your individual needs.

For example...

Our national plus rate plans include

500
Night & Weekend* Minutes
&
1,000
Mobile-to-Mobile* Minutes

Get the most out of our new CDMA service by upgrading your phone to a new CDMA phone.



Visit our website for more information on phones & rate plans
www.carolinawest.com

Carolina West
Wireless

*Night & Weekend Minutes to Mobile phones only. Restrictions apply. See website for details.

Safety Tips - April

■ Promoted CDMA 911 capabilities & hands-free set

FOR IMMEDIATE RELEASE
Contact:
Karen Potrat, Marketing Specialist
Carolina West Wireless
1307 Curtis Bridge Road
Wilkesboro, North Carolina 28697
336-973-5000
www.carolinawest.com

Carolina West Wireless Promotes Phone Safety

Carolina West Wireless is reminding all wireless phone users that safety is their first call and to use their wireless phone responsibly. During the month of March, all newly licensed drivers are encouraged to visit Carolina West Wireless to receive a free hands-free headset available with phone purchase and information covering wireless phone safety tips. Studies show that the use of hands-free headset devices drastically improve driving performance.

Carolina West Wireless also announces that all new CDMA phones in stock at Carolina West Wireless are 911 capable with built-in GPS technology. GPS technology is used to help locate the origination of 911 calls. The news headlines have been inundated with stories of how 911 calls from wireless phones have saved lives.

"Safety is our primary concern for our customers and we are committed to providing the latest technology that ensures their safety in addition to informing them of ways to improve safety," stated John McMillan, General Manager, Carolina West Wireless.

For more information on Carolina West Wireless or how you can obtain wireless safety tips, call 336-973-5000 or visit online at www.carolinawest.com.

Wireless Phone Safety Tips

When using your wireless phone in a car, practice good common sense and remember these tips:

1. When available, use a hands-free device. This allows you to keep both hands on the wheel. These devices are available at our stores and agent locations.
2. Get to know your wireless phone and its features such as voice dial, if available; these features help you to place your call without taking your attention off the road.
3. Position your wireless phone within easy reach. Be able to access your wireless phone without removing your eyes from the road.
4. Let the person you are speaking with know you are driving; if necessary, suspend the call in heavy traffic or hazardous weather conditions.
5. Do not take notes or look up phone numbers while driving. Pull over and stop before taking notes.
6. Dial sensibly and place calls when you are not moving or before pulling into traffic.
7. Do not engage in stressful or emotional conversations that may be distracting. Pull over and call back the caller or send to voice mail.
8. Use your wireless phone to call for help. Dial 9-1-1 in the case of fire, traffic accident or medical emergencies. Remember, it is a free call on your wireless phone! All new CDMA Carolina West Wireless phones are 911 capable with built-in GPS technology. GPS technology helps locate your 911 calls.

**Carolina West
Wireless**

Know any newly licensed teenage drivers?
If so, give them this coupon for a...

FREE*
Hands-Free Headset

*With purchase of any phone. Expires 3/31/05.
Must present this coupon at participating store.

Save 100%

2nd Cell Site Postcard - July

- Advertised new sites in Scottville, Piney Creek, Spry Road, Ennice, Edmonds, Lemly Hill, Idelwild Road & Laurel Springs

Great News! We've expanded our service in your area. We've recently added a new cell site in Scottville. We now have more than 70 cell sites throughout our 6-county service area—more than any other carrier in the region.

However, the new cell site is equipped with our new CDMA technology. To get the most from your wireless service and the new cell site, you'll need to upgrade your current TDMA or analog phone for a new CDMA phone. Bring in this postcard & we'll reward you with a FREE Kyocera Aktiv phone or up to \$50 to use on a new CDMA phone when you extend your contract.

We have a wide selection of CDMA phones to choose from including phones with cameras, FM radios, & much more. We encourage you to upgrade your old phone, so you can enjoy the benefits of the new CDMA cell sites.

We appreciate your continued business!

* With this card, we will reward CDMA phone purchase. In future, we will offer a cash back for customer's old phone. No phone purchase necessary. Offer not for cash back.

We've added a cell site in your area...

To take advantage of the enhanced service, you'll need to upgrade your current phone for a new CDMA phone!



we're giving you a
FREE* Kyocera
Aktiv

or up to \$50*
to use toward a new CDMA phone!

See reverse side for details.

Carolina West
Wireless



2nd Cell Site Postcard - July

■ Press Releases

FOR IMMEDIATE RELEASE

Contact:

Karen Polcar, Marketing Specialist

Carolina West Wireless

1307 Curtis Bridge Road

Wikesboro, North Carolina 28577

336-973-5000

www.carolinawestwireless.com

Carolina West Wireless Expands Service in Alleghany County

Wikesboro, NC- In their continued effort to provide outstanding wireless service for residents of Alleghany County, Carolina West Wireless, recently added five new cell sites. The new cell sites will improve coverage along Highway 221, Highway 113, along Highway 18 north of Sparta and in the Piny Creek and Turkey Knob communities. Other areas of increased coverage include Highway 93 around the Twin Oaks area, Highway 18 south of Laurel Springs, and Highway 88 heading into West Jefferson. Future sites are being planned for the Roaring Gap community.

Carolina West Wireless continues to invest in their network as part of their commitment to provide northwest North Carolina with the best wireless service available. Technicians from Carolina West Wireless conducted test calls while traveling throughout the area and report the service is "second to none."

The new towers are equipped with CDMA technology which offers enhanced phone and technology including improved voice and call quality, longer battery life for phones, and a larger selection of phones with capabilities including camera options, text messaging, downloadable ring tones and games. Residents living in the Alleghany County area that would like to take advantage of the new CDMA cell sites are encouraged to visit Carolina West Wireless.

For more information on Carolina West Wireless, call 336-973-5000 or visit online at www.carolinawestwireless.com.

Carolina West Wireless Expands Service in Ashe County

Wikesboro, NC- In their continued effort to provide outstanding wireless service for residents of Ashe County, Carolina West Wireless, recently added three new cell sites. The new cell sites will increase coverage on Highway 221, Highway 163 in the Idlewild and Phillips Gap area, as well as Highway 221 around the Baldwin community. Future sites are being planned in and around Todd, Creston and the Ashe County Airport.

Carolina West Wireless continues to invest in their network as part of their commitment to provide northwest North Carolina with the best wireless service available. Technicians from Carolina West Wireless conducted test calls while traveling throughout the area and report the service is "second to none."

The new towers are equipped with CDMA technology which offers enhanced phone and technology including improved voice and call quality, longer battery life for phones, and a larger selection of phones with capabilities including camera options, text messaging, downloadable ring tones and games. Residents living in the Ashe County area that would like to take advantage of the new CDMA cell sites are encouraged to visit Carolina West Wireless.

For more information on Carolina West Wireless, call 336-973-5000 or visit online at www.carolinawestwireless.com.

FOR IMMEDIATE RELEASE
Contact:
Karen Polcar, Marketing Specialist
Carolina West Wireless
1307 Curtis Bridge Road
Wikesboro, North Carolina 28577
336-973-5000
www.carolinawestwireless.com

[illegible]

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Contract Renewal Program - Sept.

- Advertised in-store & by customer service reps when customers call in.

Contract Renewal Program

Using the attached price sheet you now have the opportunity to offer customers who are within a certain profit range a special promotion for renewing their contract. Notice this is only for customers renewing contracts with a positive profit.

YOU MUST FOLLOW THESE GUIDELINES!

Customer Service:

When to make this offer:

When customer calls in and you pull up their information in billing make sure to look at the contract and see if it is expired or a couple months out. Check the Profit and after you have answered their questions say "I see that your contract is about to /has expired and we value you as a customer so I would like to offer you a choice of a free phone. Would you like to hear about these phones?"

"You need to make the customer feel special and let them know that we appreciate having them as a Carolina West Customer."

"If an offer is made comments as to what has been offered must be entered into the comment screen. This is extremely important. We want the sales reps to know exactly what has been offered and discussed."

Sales:

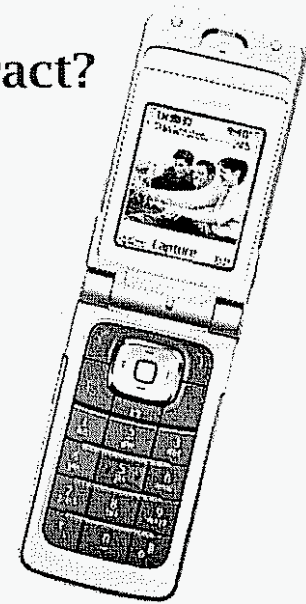
You must choose the promotion marked Retention Promotion from the Available Promotions menu. (This allows us to track the promotion to determine what is working best.)

"Use your better judgment. Make the Customer Happy."

Any Questions please feel free to call Jamie Owings or Tonya Goss.

Is it time to
renew your contract?

Receive up to
\$100*
credit
towards a new
CDMA phone



Ask for details!

Take advantage of our
10 new cell sites
in Ashe & Alleghany

by upgrading your current phone to a new CDMA phone!




Carolina West
Wireless

* Certain restrictions apply. Credit to be used towards equipment only. Cannot be redeemed for cash or credit towards account.

Contract Renewal Program - Sept.




■ Levels of renewal instructions for customer service

Level One: Reduction of Phone Prices for Average Profit \$10 to \$35


Phone	2-yr contract	1-yr contract
	Free Regular Price \$29.00	\$29.00 Regular Price \$19.00
	Free Regular Price \$9.00	\$9.00 Regular Price \$29.00
	Free Regular Price \$29.00	\$29.00 Regular Price \$19.00

Plus 200 Local Minutes Good for Six Months



Level Two: Price Reduction on Phone for

Phone	2-yr contract	1-yr contract
	Profit \$75 or More FREE Profit \$36 to \$74 FREE Profit Up to \$35 \$19 Regular Price \$59	\$59.00 Regular Price \$89
	Profit \$75 or More FREE Profit \$36 to \$74 FREE Profit Up to \$35 \$19 Regular Price \$89	\$89.00 Regular Price \$139
	Profit \$75 or More FREE Profit \$36 to \$74 FREE Profit Up to \$35 \$19 Regular Price \$89	\$89.00 Regular Price \$139

Plus 200 Local Minutes Good for Six Months

Phone	2-yr contract	1-yr contract
	Profit \$75 or More FREE Profit \$36 to \$74 FREE Profit Up to \$35 \$29 Regular Price \$49	\$49.00 Regular Price \$89

Level Three: Price Reduction for Phone Average Profit \$75 or H

Phone	2-yr contract	1-yr contract
	Profit \$75 or More FREE Profit \$36 to \$74 \$79 Profit Up to \$35 \$109 Regular Price \$129	\$129.00 Regular Price \$179
	Profit \$75 or More FREE Profit \$36 to \$74 \$89 Profit Up to \$35 \$119 Regular Price \$139	\$139.00 Regular Price \$189

Plus 200 Local Minutes Good for Six Months

DECLARATION


I, Slayton S. Stewart, hereby state and declare:

1. I am Chief Executive Officer for North Carolina RSA 3 Cellular Telephone Company d/b/a Carolina West Wireless, a wireless telecommunications services operator and the Petitioner herein.

2. I am familiar with the facts contained in the foregoing "Request For Limited Waiver And Extension Of The Handset Penetration Deadline Of The Commission's Phase II E911 Rules" and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct

Executed on this 5th day of October, 2005.



Slayton S. Stewart
Chief Executive Officer